

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

**BUG JUICE BRANDS, INC. and
JOSEPH J. NORTON,**

Plaintiffs,

Civil Action No. 10-CV-229 (PLM)

v.

Honorable Paul L. Maloney, Chief Judge

**GREAT LAKES BOTTLING
COMPANY,**

Defendant.

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MOTION FOR EXPEDITED DISCOVERY

Plaintiffs, Bug Juice Brands, Inc. and Joseph J. Norton ("Plaintiffs"), hereby move, pursuant to Fed. R. Civ. P. 26(d), 30(a)(2)(C), and 34(b), for an Order permitting Plaintiffs to serve the discovery, attached as Exhibits A and B to Plaintiffs' Brief in Support of their Motion for Expedited Discovery, on Defendant prior to the time designated by Fed. R. Civ. P. 26(d). Plaintiffs seek this relief so the requested discovery is completed one week prior to the hearing on their Motion for Preliminary Injunction, which is filed simultaneously herewith.

As set forth in the accompanying Brief, the requested expedited discovery is necessary in order for Plaintiffs to prepare for the hearing on their Motion for Preliminary Injunction and to understand the full extent of Defendant's infringement of Plaintiffs' BUG JUICE® mark, trade dress, jungle slogan, and jungle theme.

For ease of reference, Plaintiffs also attached to their Brief, as Exhibit C, a proposed Protective Order to govern the handling of confidential information disclosed during discovery.

Pursuant to Local Rule 7.1, Plaintiffs were unable to confer related to this Motion because Defendant has not filed an appearance.

Respectfully submitted,

Dated: March 22, 2010

By: /s/ David J. Gass
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